Høringssvar fra Norsk studentorganisasjon

NSOs høringssvar til endringer i ESG

ESG Steering Committee 09.01.26

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ESG Context, scope, purposes and principles

Comments on the Context, scope, purposes and principles

NSO is pleased that students are included in the definition of stakeholders, as their involvement is essential to ensuring that quality assurance reflects the real needs and expectations of learners. The updated ESG rightly places quality assurance in a broader context by recognising its links to the learning environment, research, innovation, and societal engagement. We believe the current balance is appropriate: these elements are connected to quality assurance and should be acknowledged, but they must not dominate to the extent that the core purpose of the ESG is diluted.

Part 1

Standard 1.1 Policy for Quality Assurance.

ESG 1.1 Comments on the standard/guidelines

It is great that the standard clearly states that students should have a structured, meaningful, and visible role in developing and implementing quality assurance policies. This matters because students bring first-hand experience of learning and teaching, making the policies more relevant and effective.

The emphasis on academic freedom, academic integrity, and the public responsibility of higher education in the guidelines is very positive and needed. In addition, the policy should explicitly include a commitment to safeguarding against intolerance and any form of discrimination towards students or staff, as was stated in the 2015 version of the ESG. This is essential for creating an inclusive learning environment.

Standard 1.2 Design, approval, ongoing monitoring and periodic review of programmes.

ESG 1.2 Comments on the standard/guidelines

We are pleased to see that in ESG 1.2, the requirement for periodic review and revision of programmes with student involvement has been moved from the guidelines to the standards. This change underlines the importance of student participation in these processes. It is encouraging that section 1.2 reinforces the principle that students should be equal partners in programme design, approval, monitoring, and review.

Standard 1.3 Student-centred learning, teaching and assessment.

ESG 1.3 Comments on the standard/guidelines

It is important that ESG 1.3 acknowledges, as it does in the proposed draft, diverse learning paths and ensures that institutional approaches to learning and teaching respect and address the diversity of students and their needs.

We believe that digital technologies are not given sufficient emphasis in the current draft. It is essential that digital and technological tools feature more prominently in the ESG, considering their transformative impact on teaching, learning, and assessment. Digital solutions, including artificial intelligence (AI), are now integral to higher education and can enhance accessibility, efficiency, and innovation. Under 'quality assurance processes for student assessment' in the guidelines, we recommend adding an additional bullet point on the effective use of digital technologies. Furthermore, students and staff should be provided with clear guidance and the necessary skills to use these tools responsibly and effectively.

Standard 1.4 Student admission, progression, recognition, and certification.

ESG 1.4 Comments on the standard/guidelines

NSO considers it essential that the ESG includes, as it does in the draft, a strong emphasis on access policies, admissions processes and criteria being implemented consistently, fairly, and transparently. We believe this is a critical component of the standards and guidelines. At the same time, we strongly recommend that the ESG also explicitly underline the principle of equal rights and opportunities to study for all students under "1.4 student admission, progression, recognition, and certification". This addition would reinforce the commitment to genuine inclusivity and fairness across higher education.

Standard 1.5 Teaching staff.

ESG 1.5 Comments on the standard/guidelines

It is positive that the standard adopts a broader definition of those involved in education delivery, as this is not only limited to traditional academic staff. Student assistants, in particular, play a key role in supporting teaching and learning processes and should be explicitly mentioned. Recognising their contribution would strengthen the clarity and inclusiveness of the standard.

The inclusion of student feedback in teacher evaluation is an important recognition of its value in assessing teaching effectiveness and identifying areas for professional development. As students are the primary audience for teaching, their insights are indispensable. Student feedback should always be incorporated into teacher evaluations, as this would strengthen the quality assurance process and ensure evaluations reflect the actual learning experience.

A supportive environment for teaching staff should not only encourage innovation in teaching methods and the use of new technologies but also provide the necessary tools and guidance to implement them effectively. This is particularly important given the rapid development of new technologies, which continuously challenge and transform the higher education sector. Without adequate support and resources, the ambition to foster innovation risks remaining aspirational rather than operational.

Standard 1.6 Learning environment.

ESG 1.6 Comments on the standard/guidelines

The ESG draft rightly places students at the centre of the learning environment, which is essential for ensuring student-centred learning and effective resource allocation.

The ESG should also explicitly acknowledge that learning environments are both physical and digital. While digital arenas are increasingly important, physical spaces must not be deprioritised. In fact, maintaining and improving the physical learning environment is more important than ever to support interaction, collaboration, and a sense of community among students.

Standard 1.7 Information management

ESG 1.7 Comments on the standard/guidelines

We appreciate that the draft includes student feedback on support services, as this provides valuable insights for improving the overall learning experience. It is equally important, as the ESG draft states, that students, together with staff, are actively involved in providing and analysing information and in planning follow-up activities. This collaboration is essential to ensure effective management of programmes and other institutional activities and to strengthen evidence-based decision-making

If you have any overarching comments on Part 1, please provide them here:

Overall, we welcome the Part 1's strong emphasis on student involvement in internal quality assurance. We appreciate that students are not only listed as stakeholders but are highlighted as having a meaningful and visible role in these processes.

Part 2

Standard 2.2 Designing methodologies fit for purpose.

ESG 2.2 Comments on the standard/guidelines

The standard rightly states that stakeholders should be involved in the design and continuous improvement of external quality assurance, but it does not specify which stakeholders. While

students are listed as part of the definition of stakeholders under "key terms," students should still be explicitly mentioned here as in other sections to ensure continuity. As a result, the formulation could be: "Stakeholders, *including students*, should be involved in the design and continuous improvement of external quality assurance." This would strengthen clarity, ensure consistency across the document, and highlight the crucial role of students in external quality assurance.

Standard 2.4 Peer-review experts.
ESG 2.4 Comments on the standard/guidelines
NSO highly appreciates that the standard requires external quality assurance to include at least one student member, as students bring a unique perspective on the learning experience. Their involvement ensures that quality assurance processes remain student-centred, relevant, and aligned with the actual needs and expectations of learners.

It is essential that external quality assurance remains independent. The involvement of international peer-review experts plays a key role in ensuring impartiality and credibility. To emphasis this point, the last sentence under the guidelines should be reformulated as: "the involvement of international peer-review experts in external quality assurance is *crucial* as it adds a further dimension to the development and implementation of processes". This wording conveys the importance of their role more effectively than describing it as merely "desirable."

Standard 2.5 Processes and criteria for outcomes.
ESG 2.5 Comments on the standard/guidelines
We are happy to see that evidence collected and analysed is moved from guidelines to standards in the draft to reaffirm good practices.

Standard 2.6 Reporting.
ESG 2.6 Comments on the standard/guidelines
In the last paragraph under guidelines, it is stated that "a summary of the report would increase its accessibility and transparency." Including a summary of the reports as a measure to increase accessibility and transparency is very positive, and therefore this should be a requirement rather than an optional feature.

If you have any overarching comments on Part 2, please provide them here:
Our overall impression is that students have a less prominent role in this section compared to the other sections in the draft. It is crucial that their involvement in external quality assurance is explicitly stated, as experience shows that this role can be overlooked unless clearly defined.

Part 3

Standard 3.1 Activities, policy and processes for quality assurance.

ESG 3.1 Comments on the standard/guidelines

We are very pleased that the standard explicitly recognises students as key stakeholders who should have meaningful involvement in quality assurance agencies. This is crucial to ensure that quality assurance processes remain relevant and reflective of the actual learning experience.

We strongly believe that the expertise within quality assurance agencies can be significantly enhanced by including international members in their structures, as mentioned in the last sentence under the guidelines. This is important not only for broadening perspectives but also for ensuring that external quality assurance aligns with international standards and remains comparable across countries. To underline its importance, this requirement could be elevated from the guidelines to the standard, as it is a key mechanism for ensuring consistent implementation of the ESG across Europe.

Standard 3.2 Independence.

ESG 3.2 Comments on the standard/guidelines

We welcome the emphasis on independence in the ESG draft, and it is vital that this section remains strong in the final version. Independence underpins impartial decision-making and institutional credibility, which is particularly important given the growing threats to institutional autonomy.

Standard 3.4 Resources.

ESG 3.4 Comments on the standard/guidelines

We believe this section should place greater emphasis on the importance of relevant digital tools and digital competence for quality assurance agencies. The rapid pace of technological development means the sector is in constant adaptation, and leveraging these tools can significantly streamline processes, improve efficiency, and enhance the overall quality of work. Ensuring agencies have the necessary digital capabilities is therefore essential for maintaining high standards and future-proofing quality assurance.

If you have any other comments on the draft of the ESG 2027, please provide them here:

We are happy that students play a bigger role in this draft of the ESG compared to the 2015-version. This is very important as students bring a unique perspective on the learning experience. Their involvement ensures that quality assurance processes remain student-centred, relevant, and aligned with the actual needs and expectations of learners.

It is positive that the updated ESG introduces no drastic changes, as continuity helps ensure stability for European quality assurance work. At the same time, the new additions strengthen the ESG's relevance by placing quality assurance in a broader context, acknowledging its links to the learning environment, research, innovation and societal engagement, while also incorporating fundamental values.

Although the draft makes an effort to update the ESG to ensure its continued relevance, we believe it lacks sufficient emphasis on digital skills and tools, particularly given the growing role of artificial intelligence (AI) in higher education. Digital competence is critical for quality assurance to remain effective and future-oriented. In addition, the draft does not address preparedness, which should be included as the sector increasingly faces crises such as health emergencies, wars, environmental challenges, illiberal developments and economic instability. Building resilience and readiness is critical to safeguarding quality assurance under unpredictable conditions.

The National Union of Students in Norway (NSO) appreciates the opportunity to provide input on the first complete draft of the ESG 2027. NSO represents over 280,000 students at Norwegian higher education institutions.